



PAOLO A. STRINO
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July 11, 2023

VIA ECF

The Honorable Jennifer L. Rochon
United States District Judge, Southern District of New York
United States Courthouse
500 Pearl Street, Room 1920
New York, NY 10007

Re: Lightning Bolt US LLC v. LightningBolt Europe, S.A., No.: 1:23-cv-03724-JLR

Dear Judge Rochon,

We represent Defendant LightningBolt Europe, S.A. ("LightningBolt Europe") in the above-referenced matter. Pursuant to Paragraph 1.F of the Court's Individual Rules of Practice in Civil Cases, we respectfully submit this letter-motion on behalf of LightningBolt Europe, for an extension of time to file responsive pleadings or, if appropriate, Rule 12(b) motions, and for an adjournment of the initial pretrial conference.

1. The original due date for LightningBolt Europe to file a responsive pleading or, if appropriate, Rule 12(b) motions is August 7, 2023. We are requesting an extension to September 15, 2023.
2. This is the first request for an adjournment or extension of time in this matter.
3. There have been no previous requests for adjournment or extension of time.
4. The Plaintiff, Lightning Bolt US LLC, has consented to this extension and adjournment.

Given the requested extension for the response, we also respectfully request that the Initial Pretrial Conference (ECF No. 8), currently scheduled for August 16, 2023, be adjourned to one of the following mutually agreeable alternative dates: October 2, 2023, October 3, 2023 and October 4, 2023.

The requested extension affects no other scheduled date, and no Civil Case Management Plan has been entered in this matter. Considering the proposed changes, we are prepared to cooperate with Plaintiff's counsel in drafting a suitable Civil Case Management Plan at the appropriate time.



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We appreciate the Court's consideration of this request and stand ready to provide any additional information the Court may require.

Thank you for your attention to this matter.

Respectfully submitted,

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Paolo A. Strino
Counsel for Defendant

PAS

The requests are GRANTED. Defendant shall respond to the Complaint no later than **September 15, 2023**. IT IS HEREBY ORDERED that the Initial Pretrial Conference, previously scheduled for August 16, 2023, is adjourned to **October 4, 2023** at 4:30 p.m. in Courtroom 20B of the Daniel Patrick Moynihan U.S. Courthouse.

Dated: July 12, 2023
New York, New York

SO ORDERED

A handwritten signature in black ink, appearing to read "Jennifer L. Rochon", positioned above a horizontal line.

JENNIFER L. ROCHON
United States District Judge